Mr. Ronald Collins
Delphi Energy & Engine Management Systems
2900 South Scatterfield Road
Anderson, IN 46011

Re: 095-11994
Second Minor Permit Modification to
Part 70 No.: T 095-6388-00016

Dear Mr. Collins:

Delphi Energy & Engine Management Systems was issued a Part 70 Operating Permit on August 31, 1999 for an automobile parts manufacturing operation. A letter requesting changes to this permit was received on February 25, 2000. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of two (2) new trickle varnish lines. This permit modification will also correct the PSD source status from minor to major due to a previous determination error. This revised determination is based on the February 18, 1999 annual inspection's emissions data.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Nysa L. James or extension (3-6875), or dial (317) 233-6875.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
NLJ
cc: File - Madison County
U.S. EPA, Region V
Madison County Health Department
Anderson Office of Air Management
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT
and Anderson Office of Air Management

Delphi Energy & Engine Management Systems
2900 South Scatterfield Rd.
Anderson, IN 46013

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T095-6388-00016	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: August 31, 1999
First Minor Permit Modification: 095-11377	Pages Affected: 5, 32, 32a - 32c
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: November 18, 1999
Second Minor Permit Modification: 095-11994	Pages Affected: 5-7, 22 and 32d
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

(d) One (1) varnish dip tank, EU 11-101, identified as Dip Tank D (West), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18SA25, G20SA8 and G20WA17 respectively.

(4) One (1) double drum parts washer, identified as EU11-117, with a maximum capacity of 2000 pounds per hour, with no controls and exhausting to stack L36EA21.

(5) Two (2) engine dynamometers used for research and development.

(6) Two (2) natural gas-fired boilers, identified as boiler A and boiler B, each boiler has a heat input capacity of 33.5 million Btu per hour (mmBtu/hr). These boilers are currently installed at Plant #17, and proposed to be moved to Plant #11.

(7) One (1) trickle varnish line for stators, which exhausts to one (1) stack designated as L10SA15 and consists of the following three (3) processes:
1. preheating;
2. trickle varnish coating; and
3. curing.

(8) One (1) trickle varnish line for rotors, which exhausts to one (1) stack designated as J12WA15 and consists of the following three (3) processes:
1. preheating;
2. trickle varnish coating; and
3. curing.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input less than ten million (10,000,000) Btu per hour.

(2) Equipment powered by internal combustion engines of less than 500,000 Btu per hour capacity, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.

(3) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage tank of less than 10,500 gallon capacity.

(4) A petroleum fuel, other than gasoline, dispensing facility, having a storage tank of less than 10,500 gallon capacity, and dispensing less than 230,000 gallons per month.

(5) Storage tanks less than one thousand (1,000) gallons in capacity with annual throughputs less than twelve thousand (12,000) gallons.

(6) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.

(7) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary coatings.

(8) Machining where an aqueous cutting coolant continuously floods the machine interface.

(9) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(10) Cleaners and solvents characterized as having a vapor pressure of less than 0.7kPa; 5 mmHg or 1 psi measured at 20 degrees C (88 degrees F).

(11) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.

(12) Closed loop heating and cooling systems.

(13) Rolling oil recovery systems.

(14) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1%.

(15) Any operation using aqueous solutions containing less than 1% by weight of VOC's excluding HAPs.

(16) Forced and induced draft cooling tower system not regulated under a NESHAP.

(17) Quenching operations used with heat treating processes.

(18) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(19) Heat exchanger cleaning and repair.

(20) Trimmers that do not produce fugitive emissions and are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(21) Paved and unpaved roads and parking lots with public access.

(22) Enclosed systems for conveying plastic raw materials and plastic finished goods.

(23) Asbestos abatement projects regulated by 326 IAC 14-10.

(24) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions for those activities would not be associated with any production processes.

(25) Equipment used to collect any material that might be released during a malfunction, process upset or spill clean up, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(26) Blowdown for any of the following: sight glass; boiler, compressors; pumps and cooling towers.

(27) Furnaces used for melting metals other than beryllium with a brim full capacity of less than 460 cubic inches by volume.

(28) On-site fire and emergency response training approved by the department.

(29) Diesel generators not exceeding 1800 horsepower.

(30) Stationary fire pumps.

(31) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying and woodworking operations.

(32) Filter or coalescer media changeout.

(33) Mold release agents using low volatile products (vapor pressure less than 2 kilopascals measured at 38 degrees C).

(34) A laboratory as defined in 326 IAC 2-7-1 (21)(C).

(35) Rust prevention (Acrylic acid, methyl ethyl ketone).

(36) Other activities listed below:

Adhesive application	Enamel touch up	Re-op operation
Adhesive, hot melt	Epoxy dispenser	Repair hood
Assembly, black shell	Feeders	Rust inhibitors
Atomized aluminum powder	Filter cooling system	Sanders
Banders	Flux application	Saws, cut-off and band
Battery formation	Foaming station	Sharpeners, drill & hob
Battery test cabinets	Furnaces	Silicone coating
Blander	Glue and ink operations	Spray booth
Blasting, band, sand & steel	Glue degassing	Straightener
Broach machines, gear cutters	Glue dispensers	Sylgard dials
Buffing wheel	Lubricate seals	Test station
Chuckers	Machine aluminum molds	Thermotron units
Cleaning, ink stamp	Machining operations	Trimmer
Cleanup; general	Magnaflux	Urethane mixing station
Coil removal	Magnet assembly	Vacuum furnace
Cold boxes	Mixing station	Varnish dip
Conductive ink	Mixing tanks	Varnish strip
Cure handlers	Molding material silos	Vibration chambers
Cut-out dials, final	Molding presses	Vulcan machine
Date code stamp	Molding, plastic injection	Washer, parts
Dielectric test	Oil/water separator	Washer, rust inhibitor
Dip booth	Ovens, gas and electric	Weigh station
Dip tanks	Oven, hydrogen	Winding machines, wire
Dryer, gas-fired	Oven, thermal shock	Wire brush
Deburring	Oven, vapor-phase	Wire stripping
Electrical discharge machines	Ovens, potting	Wood shop
	Presses, punch	

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, and 326 IAC 2-7 (Part 70 Permit Program) this source is a major source.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six minute averaging period, as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(7) One (1) trickle varnish line for stators, which exhausts to one (1) stack designated as L10SA15 and consists of the following three (3) processes:
1. preheating;
2. trickle varnish coating; and
3. curing.

(8) One (1) trickle varnish line for rotors, which exhausts to one (1) stack designated as J12WA15 and consists of the following three (3) processes:
1. preheating;
2. trickle varnish coating; and
3. curing.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of applied coating of the two (2) trickle varnish lines shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Compliance Determination Requirements

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content contained in Condition D.4.1, shall be determined using the ASTM Method D6053-96, which is an approved USEPA alternative to Method 24.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.4 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1.

(1) The amount and VOC content of each material and solvent used. Records shall include purchase orders, invoices, material safety data sheets (MSDS) and alternative manufacturer information necessary to verify the type and amount used.

(2) A log of the dates of use; and

(3) The total VOC usages for each month;

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Management
and Anderson Office of Air Management

Technical Support Document (TSD) for the Second Minor Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Delphi Energy & Engine Management Systems
Source Location:	2900 South Scatterfield Road, Anderson, IN 46011
County:	Madison
SIC Code:	3714
Operation Permit No.:	T 095-6388-00016
Operation Permit Issuance Date:	August 31, 1999
Second Minor Permit Modification No.:	095-11994-00016
Permit Reviewer:	Nysa L. James

The Office of Air Management (OAM) has reviewed a modification application from Delphi Energy & Engine Management Systems relating to the operation of two (2) trickle varnish lines.

History

On February 25, 2000, Delphi Energy & Engine Management Systems submitted an application to the OAM requesting to add two (2) new trickle varnish lines to their existing plant. Delphi Energy & Engine Management Systems was issued a Part 70 permit on August 31, 1999. On November 19, 1999, Delphi Energy & Engine Management Systems was issued their First Minor Permit Modification (095-11377) to operate two (2) natural gas-fired boilers.

Existing Approvals

The source was issued a Part 70 Operating Permit (T095-6388-00016) on August 31, 1999. The source has since received the following:

(a) First Minor Permit Modification No.: 095-11377, issued on November 18, 1999.

Changes Proposed

The Office of Air Management (OAM) has reviewed an application from Delphi Energy & Engine Management Systems, relating to the first significant permit modification to their existing Part Operating Permit. The modification consists of two (2) new trickle varnish lines. This permit modification will also correct the PSD source status from minor to major. This determination is based on the February 18, 1999 annual inspection's emissions data. The source is proposing the following changes (changes are bolded and stricken out for emphasis):

1. Condition A.2, Emission Units and Pollution Control Equipment Summary listed on pages 4 and 5 of 37, is revised to reflect the two (2) new trickle varnish lines and is as follows (changes are bolded and stricken out for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) natural gas-fired boiler (C), installed in 1973, identified as EU 20-1, rated at 68.9 MMBtu/hr, with no controls, and exhausting to stack CC11EA48.

(2) One (1) natural gas-fired boiler (d), installed in 1973, identified as EU 20-2, rated at 68.9 MMBtu/hr, with no controls, and exhausting to stack CC11NA48.

(3) Varnish operations consisting of the following:

(a) One (1) varnish dip tank, EU 11-18, identified as Dip Tank A (North), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N16EA19, N16NA9 and N18NA19 respectively.

(b) One (1) varnish dip tank, EU 11-19, identified as Dip Tank B (South), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N18EA19, N20EA9 and N18EA19 respectively.

(c) One (1) varnish dip tank, EU 11-100, identified as Dip Tank C (East), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18EA25, G20EA7 and G24NA17 respectively.

(d) One (1) varnish dip tank, EU 11-101, identified as Dip Tank D (West), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18SA25, G20SA8 and G20WA17 respectively.

(4) One (1) double drum parts washer, identified as EU11-117, with a maximum capacity of 2000 pounds per hour, with no controls and exhausting to stack L36EA21.

(5) Two (2) engine dynamometers used for research and development.

(6) Two (2) natural gas-fired boilers, identified as boiler A and boiler B, each boiler has a heat input capacity of 33.5 million Btu per hour (mmBtu/hr). These boilers are currently installed at Plant #17, and proposed to be moved to Plant #11.

(7) One (1) trickle varnish line for stators, which exhausts to one (1) stack designated as L10SA15 and consists of the following three (3) processes:

1. preheating;
2. trickle varnish coating; and
3. curing.

(8) One (1) trickle varnish line for rotors, which exhausts to one (1) stack designated as J12WA15 and consists of the following three (3) processes:
1. preheating;
2. trickle varnish coating; and
3. curing.

2. Condition C.1, PSD Minor Source Status listed on page 22 of 37, is revised to correct the source status based on recent emission data from a February 18, 1999 annual inspection and is as follows (changes are bolded and stricken out for emphasis):

C.1 ~~PSD Minor~~ **Major** Source ~~Status [326 IAC 2-2] [40 CFR 52.21]~~

~~(a) The total source potential to emit of volatile organic compounds and other criteria pollutants are less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~

~~(b) Any change or modification which may increase potential to emit of volatile organic compounds or any other criteria pollutant to 250 tons per year, from the equipment covered in this permit, shall require prior approval from IDEM, OAM before such change may occur.~~

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, and 326 IAC 2-7 (Part 70 Permit Program) this source is a major source.

3. Section D.4 is added to the Part 70 Permit on page 32d, in order to account for the two (2) new trickle varnish lines. Section D.4 is as follows (changes are bolded and stricken out for emphasis):

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(7) One (1) trickle varnish line for stators, which exhausts to one (1) stack designated as L10SA15 and consists of the following three (3) processes:
1. preheating;
2. trickle varnish coating; and
3. curing.

(8) One (1) trickle varnish line for rotors, which exhausts to one (1) stack designated as J12WA15 and consists of the following three (3) processes:
1. preheating;
2. trickle varnish coating; and
3. curing.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of applied coating of the two (2) trickle varnish lines shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Compliance Determination Requirements

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content contained in Condition D.4.1, shall be determined using the ASTM Method D6053-96, which is an approved USEPA alternative to Method 24.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.4 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1.

(1) The amount and VOC content of each material and solvent used. Records shall include purchase orders, invoices, material safety data sheets (MSDS) and alternative manufacturer information necessary to verify the type and amount used.

(2) A log of the dates of use; and

(3) The total VOC usages for each month;

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
L10SA15	varnish process	30	1.25	3,000	100
J12WA15	varnish process	30	1.25	3,000	100

Recommendation

The staff recommends to the Commissioner that the Second Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.
An application for the purposes of this review was received on February 25, 2000, and additional information was received on March 10, 2000.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (page 1 of 1).

Since the preheat and curing areas are electric, there are no combustion emissions.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM-10	0.00
SO_2	0.00
VOC	22.43
CO	0.00
NO_x	0.00

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	1.19
PM-10	1.14
SO_2	0.126
VOC	122.7
CO	7.42
NO_x	29.4
Glycol Ether	38.0

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(b)(1). Also, 326 IAC 2-7-10.5(e)(3)(B) cites that operation may begin in accordance with 326 IAC 2-7-12 (Permit Modification).

County Attainment Status

The source is located in Madison County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Madison County has been designated as attainment or unclassifiable for ozone.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	4.83
PM-10	7.16
SO_2	0.569
VOC	288.6
CO	87.44
NOx	86.93

(a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the Part 70 permit issued on August 31, 1999 the source's potential to emit summary from the annual inspection on February 18, 1999 and the First Minor Source Modification issued on November 18, 1999.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Two (2) varnish lines	0.00	0.00	0.00	22.43	0.00	0.00	0.00

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

There are no changes in Federal rule applicability from the original Part 70 Permit.

State Rule Applicability - Entire Existing Source

There are no changes in State rule applicability from the original Part 70 Permit.

State Rule Applicability - Two (2) Trickle Varnish Lines

326 IAC 2-1-3.4 (New Source Toxics Rule) is not applicable to the two (2) trickle varnish lines because there are no HAPs emitted by these processes.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A. Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-3-2 (Process Operations) does not apply to the trickle varnish lines because the application method has a 100 percent transfer efficiency, therefore there are no PM emissions from the trickle varnish lines.

No other 326 IAC 6 rules apply.

326 IAC 8-1-6 (New facilities; general reduction requirements):

Pursuant to 326 IAC 8-1-6 (New facilities; general reduction requirements), the requirements of BACT do not apply to the (2) trickle varnish lines because the potential to emit of VOC of each line is less than 25 tons per year and the varnish lines are governed by 326 IAC 8-2-9 (Miscellaneous Metal Coating).

326 IAC 8-2-9 (Miscellaneous Metal Coating):

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of applied coating of the two (2) trickle varnish lines shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Based on the information submitted by the source, the two (2) trickle varnish lines are in compliance with this requirement based on the EPA approved VOC determination alternative (ASTM Method D6053-96) to Method 24.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The operation of this two (2) trickle varnish lines shall be subject to the conditions of the attached proposed Second Minor Permit Modification to a Part 70 Operating Permit No. T 095-11994-00016.